STATE OF WISCONSIN )
) SS
MILWAUKEE COUNTY )

I JON N. REDDIN, being first duly sworn, on oath state:

1. I am a Milwaukee County Assistant District Attorney.

2. On information and belief, a search warrant was issued on Friday, March 8, 1991, by Milwaukee County Circuit Court Commissioner Audrey Y. Brooks, authorizing the search of premises located at 941 S. 35th Street in the City and County of Milwaukee. On information and belief, that search warrant was based upon the testimony of a confidential informant who testified, inter alia, that in approximately 1989 the informant personally observed two homicide victims in the basement of that house, and that the informant believed that those two victims were buried in the basement of that house.

3. Upon information and belief, and upon my personal observation, upon execution of that warrant at that address, the dead bodies of two men, apparently the victims of homicide, were found buried in the ground beneath the basement floor.

4. Upon information and belief, the informant who testified at the search warrant application fears for the informant's life if the informant's identity were to become known, because the informant believes that the person or persons involved in the homicide have organized crime and/or motorcycle gang connections, and that the homicide victims may themselves have committed a homicide and were killed so that they could not identify those who had solicited them to commit it.

5. On information and belief, the informant testified as to details of the homicides of the two men, including details of what the informant thought would be found in the graves and in the adjacent areas of the basement. Those details may become important during the police investigation of the homicides as keys during questioning of the various witnesses believed to have been present. Should those details become public with the filing of the transcript of the search warrant application, it would compromise that investigation.

6. This affidavit is executed in support of my request that the inventories of items seized at the execution of the search warrant, the transcript of testimony at the search warrant application, and this affidavit, be sealed. That request is being made for the following reasons:

a. To protect the life and safety of the confidential informant who testified in support of the search warrant.

b. To preserve the confidentiality of details of the execution of the search warrant and the items seized.

c. To keep from an unarrested defendant the knowledge which would prevent escape.

d. To prevent defendant(s) from collecting perjured testimony.

e. To prevent those interested in thwarting this investigation from tampering with prospective witnesses or secreting evidence.

Dated at Milwaukee, Wisconsin this 11th day of March, 1991.

Jon N. Reddin

Subscribed and sworn to before me
this 11th day of March, 1991.

Karen E. Christenson
Notary Publi

My Commission is permanent / ~~expires~~ _____